

REMARKS

Claims 1-14, 25, and 26 are now present in this application, of which claims 1 and 11 are independent. By this amendment, claims 1 and 11 have been amended. Reconsideration of this application, as amended, is respectfully requested.

Request for Withdrawal of Finality of Office Action

Applicants respectfully submit that the current Office Action fails to establish a *prima facie* case of obviousness. In particular, the current Office Action has alleged that it would have been obvious to one of ordinary skill in the art to modify Chabanne in view of Nakamura, and in further view of Morton. Applicants respectfully disagree.

In particular, as noted by the Examiner, Chabanne discloses the use of a heating element 9 that delivers water vapor to an exhaustion port; but that Chabanne fails to disclose a container for the steam generator. Accordingly, the Office Action indicates that one of ordinary skill in the art would be motivated to modify the teachings of Chabanne to include a container as taught by Nakamura because Nakamura allegedly exhausts steam to the drum. Finally, the Office Action indicates that one of ordinary skill in the art would recognize that after having modified Chabanne to provide a container, the alleged combination would fail to provide a means for draining the container and that one of ordinary skill in the art, having created a new problem by modifying the system of Chabanne to include a container, would look to Morton to further modify Chabanne to include a drain.

Applicants respectfully submit that one of ordinary skill in the art would not be motivated to combine Chabanne, Nakamura, and Morton as proposed because the hypothetical combination solves a problem that did not originally exist with Chabanne alone. In particular, the problem created is the need to drain water from a steam generator. The only suggestion for such a combination of features is provided by the present application and the currently pending claims.

Accordingly, withdrawal of the finality of the previous Office Action, and an Office Action on the merits with respect to claims 1-14, 25, and 26 are respectfully requested.

Reasons for Entry of Amendments

At the outset, it is respectfully requested that this Amendment be entered into the Official File in view of the fact that the amendments to the claims automatically place the application in condition for allowance.

In the alternative, if the Examiner does not agree that this application is in condition for allowance, it is respectfully requested that this Amendment be entered because the Office Action fails to establish a *prima facie* case of obviousness.

Rejections under 35 U.S.C. §103

Claims 1, 2, 8-11, and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chabanne in view of Nakamura, and in further view of Morton; claims 3-7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chabanne, Nakamura, and Morton, and in further view of Edwards or Lund; claims 12 and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chabanne, Nakamura, and Morton, and in further view of Baubin or Kovich; and claims 25 and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chabanne, Nakamura, and Morton, and in further view of JP '084. These rejections are respectfully traversed.

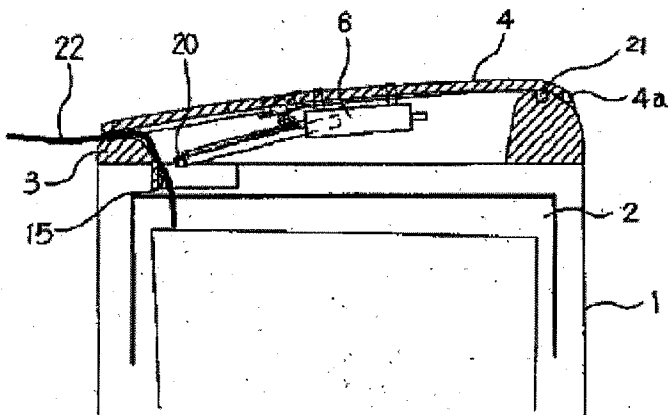
Complete discussions of the Examiner's rejections are set forth in the Office Action, and are not being repeated here.

While not conceding the appropriateness of the Examiner's rejection, but merely to advance prosecution of the instant application, Applicants respectfully submit that independent claim 1 has been amended to recite a combination of elements in a steam generator for a drum laundry machine including "a container provided with a water supply port configured to be connected to a water supply tube of the laundry machine to receive water and a steam exhaustion port configured to be connected to a steam supply tube of the laundry machine to supply steam into a tub of the laundry machine to perform a laundry course," "a heater to heat the water supplied into the container, the heater configured to be connected to and controlled by a controller of the laundry machine," and "a drain unit having an inlet to drain water which remains inside the container after supplying steam into the tub."

Similarly, while not conceding the appropriateness of the Examiner's rejection, but merely to advance prosecution of the instant application, Applicants respectfully submit that independent claim 11 has been amended to recite a combination of elements in a drum laundry machine including "a laundry tub," "a laundry drum located inside the laundry tub," "a water supply tube connected to a water supply valve," "a steam generator," "means for spraying the exhausted steam directly into the laundry drum to perform a laundry course, the means being connected to the steam exhaustion port of the steam generator," and "a controller to control the drum laundry machine to treat laundry in the drum, the controller configured to control the heater to generate steam." The steam generator includes "a container provided with a water supply port connected to the water supply tube to receive water and a steam exhaustion port to exhaust steam," "a heater to heat the water supplied into the container," and "a drain unit to drain water which remains inside the container after supplying steam into the tub until a water level of the container reaches a predetermined level."

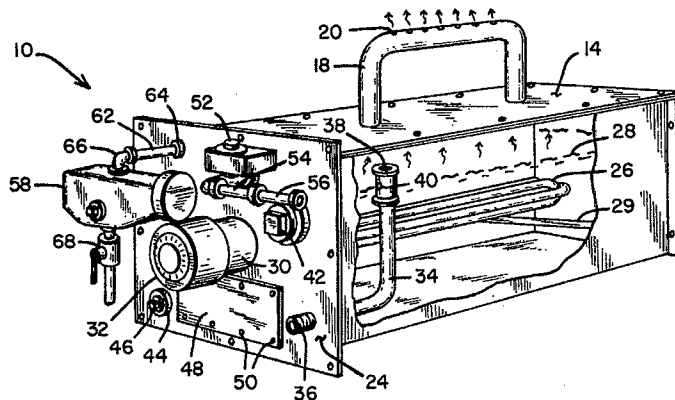
Applicants respectfully submit that these combinations of elements as set forth in independent claims 1 and 11 are not disclosed or made obvious by the prior art of record, including Chabanne, Nakamura, and Morton.

In addition to the reasons noted above requesting that the finality of the Office Action be removed, Applicants provide the following comments. The Office Action suggests that steam is supplied into a drum in Nakamura. However, this is not the case. In Nakamura, as shown in Fig. 4 (duplicated below), steam is supplied to laundry 22 which is held between the cover 4 and the frame 3.



In addition, steam is not used for performing a laundry course such as a washing course. Rather, Nakamura discloses a steam generator that is simply attached to the washing machine without having any relationship to a programmed laundry course. Accordingly, one of ordinary skill in the art would not look to Nakamura to modify Chabanne as proposed.

The Office Action also suggests that Morton disclose a steam generator that has a drain pipe 34 with an exit 40 and equates this arrangement as corresponding to the drain unit of the claimed invention. However, the drain pipe 34 and the exit 40 are only for limiting the water level inside the container. Due to the pipe 34 and the exit 40, water inside the container is kept below the exit 40 (see Fig. 4 duplicated below). Morton fails to disclose a drain unit which drains water remaining inside the container. If water remains inside the container in Morton, the water will be kept and can not be drained through the pipe 34 and the exit 40, because the remaining water will be below the exit 40.



Applicants respectfully submit that one objective of the claimed invention is to maintain the inside of the steam generator and so prevent a scale-induced problem. For example, Ca or Mg in water may cause a scale problem. The scale may be attached to a heater inside the steam generator thereby lowering the efficiency of the heater. Further, the scale may block the outlet for discharging steam. However, Morton discloses that the purpose of pipe 34 and the exit 40 is for draining water to maintain a water level below the exit 40. As clearly shown in Fig. 4, the exit 40 is higher than the heater 26, which would allow scaling to occur on the heater.

None of the other references were cited for overcoming the deficiencies identified above with respect to the hypothetical combination of Chabanne, Nakamura, and Morton.

Applicants respectfully submit that the combination of elements as set forth in independent claims 1 and 11 are not disclosed or made obvious by the prior art of record, including Chabanne, Nakamura, and Morton, for the reasons explained above. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

With regard to dependent claims 2-10, 12-14, 25, and 26, Applicants submit that these claims depend, either directly or indirectly, from one of independent claims 1 and 11, which are allowable for the reasons set forth above, and therefore these claims are allowable based on their dependence from claim 1 or 11, as well as for their additionally recited subject matter. Reconsideration and allowance thereof are respectfully requested.

CONCLUSION

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Chad D. Wells, Reg. No. 50,875, at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Dated: March 31, 2009

CDW

Respectfully submitted,

By


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